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IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

D. GEORGE SWEIGERT

Plaintiff,

vs.

JASON GOODMAN,

Defendant

Case No.: 1:18-cv-08653-VEC-SDA

MOTION FOR LEAVE TO EXTEND TIME  
TO RESPOND TO SECOND AMENDED  
COMPLAINT WITH COUNTERCLAIM  
AND THIRD-PARTY COMPLAINT

**MOTION FOR LEAVE TO EXTEND TIME TO RESPOND TO SECOND AMENDED  
COMPLAINT WITH COUNTERCLAIM AND THIRD-PARTY COMPLAINT**

Defendant, Jason Goodman, Pro Se moves this Honorable Court for an extension of time to file a response to the Second Amended Complaint filed by Plaintiff, D. George Sweigert ("Plaintiff") which will include an amended counterclaim and a new third party complaint, and states as follows:

1. The non-party Steve Outtrim is a known associate of Plaintiff. In the past, Outtrim has participated in coordinated activities with Plaintiff intended to disrupt Goodman's business, personal life and legal Defense. In the Virginia suit, (Steele v Goodman 3:17-cv-00601-MHL) Outtrim wrote a declaration in support of Plaintiff's motion to intervene. The motion was denied as the court in Virginia recognized the frivolous nature of their claims and their attempt to abuse the legal process. Outtrim's inappropriate email of November 7, 2019 represents a demonstration of pattern and practice of frivolous intervention attempts and abuse of process intended to increase these proceedings.

MOTION FOR LEAVE TO EXTEND TIME TO RESPOND TO SECOND AMENDED COMPLAINT WITH  
COUNTERCLAIM AND THIRD-PARTY COMPLAINT - 1

1           2.     This new development has underlying causes and consequences that have given  
2                 rise to the need for a counterclaim against Plaintiff and a third-party complaint  
3                 against Outtrim.

4           3.     Defendant had no way of anticipating this new development would occur in such  
5                 close proximity to the filing deadline.

6           4.     The filing of the motion for leave was delayed one day by the Veteran's Day  
7                 holiday closure of the court on Monday November 11.

8           5.     Plaintiff has been granted liberal leave by the court to file, refile, amend and re-  
9                 amend numerous motions and pleadings throughout the course of this matter. In  
10                the interest of serving equal justice, Defendant's motion should be granted.

11           6.     No party would be prejudiced by the extension.

12           7.     The time to respond has not expired.

13           WHEREFORE, Defendant, Jason Goodman, hereby requests that the Court enter an  
14           Order (1) granting her Motion for an Extension of Time; (2) providing Defendant with an  
15           extension of time to file his response to the Second Amended Complaint with counterclaim and  
16           third party complaint until on or before November 21, 2019; and (3) awarding Defendant such  
17           further relief as the Court deems appropriate.  
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1 I hereby attest that the pleadings herein are accurate and true under penalties of perjury.

2 Further, I hereby attest that the attached exhibits are accurate and true copies of source  
3 documents as described.

4 Signed this \_\_14\_\_ day of November 2019  
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Jason Goodman, Defendant, Pro Se  
252 7<sup>th</sup> Avenue Apt 6s  
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(323) 744-7594  
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15 Defendant's request is GRANTED IN PART and DENIED IN PART. The deadline to respond  
16 to the Second Amended Complaint is extended to Monday, November 18, 2019.

17 Defendant must seek leave to file a third-party complaint, pursuant to Federal Rule of  
18 Civil Procedure 14. If Defendant has a good-faith basis to seek such leave, he shall file a  
19 motion for leave on or before November 29, 2019.

20 SO ORDERED.

21 Dated: November 14, 2019

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**CERTIFICATE OF SERVICE**

I hereby certify that on November 14, 2019, a true copy of the foregoing was sent via email  
to the following:

D. George Sweigert  
C/O General Delivery  
Rough & Ready, CA 95975

Signed this \_\_14\_\_ day of November 2019



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